

THE
ROTH LAW FIRM
PLLC

April 18, 2024

VIA ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street, 14A
New York, NY 10007-1312

**APPLICATION GRANTED
SO ORDERED**

4/19/24 
John G. Koeltl, U.S.D.J.

**Re: Kunstler, Hrbek, Goetz and Glass v. The Central Intelligence Agency,
Pompeo, Morales and Undercover Global S.L., 22 Cv. 6913**

Dear Judge Koeltl:

We write respectfully on behalf of plaintiffs Kunstler, Hrbek, Goetz and Glass (collectively, "Plaintiffs") as well as, defendant the Central Intelligence Agency ("CIA"), to request additional time and set forth the briefing schedule for the CIA's motion to dismiss based on its assertion of the state secrets privilege, filed on April 15, 2024. Dkt. Nos. 85-88.

Plaintiffs respectfully request an extension to May 24, 2024 to file an opposition to the CIA's motion to dismiss. The current deadline for Plaintiffs to oppose the motion is April 29, 2024. The additional time is necessary and requested due to Plaintiffs' counsel's observance of Passover and scheduled vacations, as well as the complexity of the issues raised and the office's workload.

Defendant CIA similarly requests that its deadline to file a reply brief be pushed back to Friday June 14, 2024.

We thank the Court for its consideration of this request.

Respectfully submitted,



Richard A. Roth, Esq.